1.0 PROJECT DESCRIPTION, LOCATION, & ENVIRONMENTAL SETTING

1.1 Purpose of the Dead, Dying and Diseased (DDD) Tree Removal Program

The removal of dead, dying and diseased (DDD) trees, as described in this EIR, would be implemented as a fire prevention measure proposed by the County. DDD trees in the forested areas of San Diego County present a major threat to public safety, particularly along State Route (SR) 78 and SR 79, the only evacuation routes out of the Greater Julian Area and critical highways for safe escape during wildland fires. Insuring that these highways are passable during times of major catastrophes, such as wildfires, is vital to save lives.

In addition to the massive number of trees killed by the wildland fires during the past decade, almost 500,000 trees have died as a result of insect infestation (CAL FIRE 2011), primarily gold-spotted oak borer (GSOB) and pine bark beetle infestation. As they weaken, many dead, dying and diseased trees fall, which threatens lives, structures and evacuation routes. Additional trees have died from the extended drought and other, sometimes unknown, reasons. High levels of tree mortality may result in increased fire risk, loss of threatened and endangered species, loss of species diversity, degraded watershed conditions, and increased potential for damage from other agents of disturbance, including invasive species.

The largest wildland fire accurately recorded in California is the October 2003 Cedar Fire that burned 273,246 acres and 2,820 structures (destroyed 2,232 residences, 22 commercial properties, and 566 outbuildings, and damaged 53 residences), and killed 15 people in San Diego County (California Department of Forestry and Fire Protection [CAL FIRE] 2009). In total for the fire sieges of 2003 and 2007 in San Diego County, four wildland fires burned 384,829 acres and destroyed 3,239 structures in 2003 and ten burned 371,846 acres and destroyed 2,383 structures in 2007. These were the largest, but not the only fires, that San Diego County has endured during the past decade. In total since 2000, 144 large fires have burned 862,864 acres, destroyed 5,844 structures, and killed 23 people and countless domestic and wild animals in San Diego County.

Catastrophic wildfires burn hotter and faster than most ordinary fires. In addition to the losses described above, visibility and air quality are reduced, which threatens the health of many people, even those who do not live near the fires. Healthy habitat for endangered, threatened and rare species and other wildlife is destroyed.

Vulnerable building construction, structures ignited by burning vegetation, poor access and escape routes, inadequate escape routes, and limited fire fighting resources were some of the problems that the County identified from fires in 2003, 2007 and other years. For decades, the County has worked with fire agencies, planners, environmental experts and the building industry to craft codes that are responsive to the wildfire challenge. Since the 1980s, the County's fire codes have been strengthened in successive code adoption cycles with the primary goal of protecting the safety of the County's citizens and enhancing their homes' ability to survive wildfire. Lessons learned from the devastating wildfires of 2003 resulted in further refining of the County fire and building codes.

In July of 2007, before that year's wildfires, the State of California adopted new fire and building codes, which are based on the 2006 International Fire Code and the 2006 International Building Code, respectively. The latest adoption of the County's fire and building codes, effective January 30,

2008, was an effort to both coordinate with the latest State codes and to further refine the County's modifications to the State codes.

The number of dead, dying and diseased trees and the need to remove them as a means to protect people and property against the threat of wildland fire is not unique to San Diego County. Other states and other southern California counties are facing the same issues. The Mountain Area Safety Taskforce (MAST) reports that over 1.5 million DDD trees have been removed from private properties in the mountains of San Bernardino and Riverside Counties through their Hazardous Tree Abatement Program (Mountain Area Safety Taskforce 2011). The proposed project would fund the removal of approximately 20,000 DDD trees.

The County of San Diego proposes to accept a grant from the U.S. Forest Service (USFS) to strategically remove selected DDD trees from qualifying private properties in the Greater Julian Area. Following acceptance of the grant, the County would publish a Request for Proposal that would include the requirements of the grant and this EIR, and hire a contractor to remove the DDD trees. Such removal is one of the recommendations of the San Diego County Forest Area Safety Taskforce (FAST) to ensure that during fires and other catastrophic events, DDD trees do not increase the risk of loss of life or structures. This chapter describes the components of the proposed project, including its objectives, purpose and background.

1.2 Project Objectives

The objectives of the proposed project are to:

1. Meet the requirements of the USFS grant for the removal of dead, dying[1] and diseased[2] (DDD) trees within the Greater Julian Area, based on the priority areas recommended by the FAST program.
2. Help to prevent DDD trees from impeding the evacuation of people and domestic animals or hindering fire access by firefighters.
3. Create defensible space along evacuation and fire access routes and around habitable structures so firefighters can more safely and effectively fight wildfires.

Achieving the project objectives could have additional beneficial results. Removing DDD trees would improve light penetration to the forest floor that may result in multi-generational tree growth, improve forest health, and increase biodiversity. In addition, removing DDD oak trees may help reduce the infestation and spread of the gold-spotted oak borer.

[1] *Dying trees* are trees that exhibit one or more of the following: fifty percent or more of the foliage-bearing crown is dead or fading in color from a normal green to yellow, sorrel, or brown, excluding normal autumn coloration changes; successful bark beetle attacks with indications of dead cambium and brood development distributed around the circumference of the bole; seventy-five percent or more of the circumference of the lower bole is girdled by wildlife; or trees designated by a Registered Professional Forester as likely to die within one year (CAL FIRE 2010).

[2] *Diseased trees* are trees that have abnormal physiological conditions or structural changes that result in a substantial adverse effect on the trees' health or threatens to spread the disease, thus threatening the sustained health of surrounding trees. These conditions or structural changes express characteristic signs or symptoms and are caused by identifiable biotic or abiotic agents including, but not limited to, fungi, bacteria, insects, parasitic plants, vertebrates, lightning, fire and mechanical wounds (CAL FIRE 2010).

1.3 Project Description

The San Diego County Fire Authority proposes to strategically remove selected DDD trees on privately owned parcels within a 500-foot maximum treatment width[3] along each side of State Route (SR) 78 and SR 79 (includes the joint SR 78/79)and in Whispering Pines in the Greater Julian Area (Figure 1), and around existing structures and infrastructure facilities located along evacuation routes (adjoining roads that provide access to at least three homes or facilities). If a parcel is partially within the 500-foot distance along SR 78 or SR 79, the homes and structures on those parcels, as well as the access roads and driveways to them, would be included in the DDD tree removal treatment area. These parcels would receive treatment for up to 500 feet from the structure, access road or driveway, or to the property boundary, whichever is shorter. Only above ground parts of the DDD trees would be removed; tree stumps and roots would not be removed. Minor amounts of understory vegetation may be disturbed in removing individual DDD trees.

The private parcels for the initial phase of project implementation are along SR 78 and SR 79, as these are the only major thoroughfares into and out of the Greater Julian Area. As such, treatment of emergency access and evacuation corridors along these highways is paramount. Whispering Pines will also be treated as part of the initial phase. Parcels that were scheduled to be treated before the need to prepare an EIR arose are shown on Figure 2; it is anticipated that close to the same number of parcels, if not the same parcels themselves, will be treated by the project. If funding remains after the initial phase is completed, additional locations within the Greater Julian Area would be treated, including access roads to communities such as northern Cuyamaca, Harrison Park, Pine Hills, and Kentwood in the Pines, followed by the FAST Cuyamaca – Laguna project area, and then the Descanso, Guatay and Pine Valley areas (Figure 3) because they provide access to Interstate-8 (I-8) for evacuation. This EIR addresses all of these areas where DDD trees may be removed by the project.

All the DDD tree removal would occur only on private properties. The proposed project is a voluntary program that would be provided at no cost to property owners; however, permission in the form of right-of-entry letter agreements to remove trees would be required from the private property owners prior to tree removal.

An estimated 20,000 DDD trees will be removed from participating parcels in the project area. Approximately 90 percent of these would be DDD oak trees, with the lesser component consisting of conifer species. In 2010, owners of approximately 375 privately-owned parcels agreed to participate in the DDD tree removal program; however, the right-of-entry letters signed by those property owners have expired since the need to prepare an Environmental Impact Report (EIR) has arisen. The County will need to resend the notice describing the proposed project and requesting right-of-entry letters from the owners who choose to participate. The County anticipates that approximately the same number of owners will choose to have the DDD trees removed from their properties as did so in 2010, with just a few properties added or deleted.

[3] In practice, the treatment area width would vary depending on an assessment of field conditions including site topography (steepness) and accessibility of DDD trees to be removed, any identified safety considerations, and the presence of sensitive biological or cultural resources. Therefore, in some instances the treatment area width would be narrower than 500 feet, and in no instance would exceed 500 feet in width.

Selected DDD trees would be removed on approximately 1,200 acres, although, due to wildlife concerns, owner participation, or tree location, not all DDD trees would be removed from all of the participating parcels. Based on past experience, the number of dead trees marked and removed per acre has ranged from one to 24. With the infestation of GSOB causing high mortality in oaks in San Diego County and the need to curtail the infestation, the number of DDD oak trees that may be removed per acre may be higher on some parcels.

Funding for the proposed project would be provided by a $7 million USFS grant. The grant states that "the County will only remove dead, dying and diseased trees and will not remove or modify any vegetation other than dead, dying and diseased trees. In addition, the County will not remove any dead, dying and diseased trees from open space areas." No shrubs will be removed. The grant money cannot be used for other purposes, such as fortifying homes against wildfire.

1.3.1 Background

Trees have died in the Greater Julian Area for several reasons. Southern California has been subjected to a prolonged drought for the past 13 years, during which only two rainfall seasons exceeded normal precipitation levels. This drought period has included the driest season in recorded history, in which seasonal rainfall was only thirty percent of normal. Over this 13-year time period the Cuyamaca Lake region received 100 inches less rain than normal. This extended dry period has stressed the health of forest trees, killing some, and also has provided opportunities for tree killing insects that favor stressed, unhealthy trees. The gold-spotted oak borer (*Agrilus coxalis*), discussed in more detail below, is the primary insect killer of oak trees in the Greater Julian area, and about 90 percent of the DDD trees proposed to be removed are oaks. Removal of these infested trees would help reduce the spread of the insect. The other DDD trees that would be removed are conifers.

Another reason for the high level of tree mortality in the Greater Julian Area and other parts of the San Diego County, including the Cuyamaca - Laguna area, is that small naturally occurring ground fires that would burn the understory and thin the forest, reducing competition for resources, have largely been suppressed since about 1900. This suppression, coupled with other causes of tree mortality, has increased fuel loads (the total amount of potential fuel for a fire in a given area, such as dead, dry, more easily flammable woody material). The presumption is that if these forests had retained a fire regime that caused lower tree densities, more trees would have survived during the recent drought because competition for water would have been less severe. Other trees have probably died because, though precipitation was sufficient to induce sprouting of seedlings and growth of young trees, the maturing trees competed for limited water and nutrients in the soil with the result that all the trees were stressed and some died. The loss of tens of thousands of acres of forest in Cuyamaca Rancho State Park during the Cedar Fire of 2003 is an example of the devastating consequences that occur when overly dense forests with high numbers of dead trees burn in large wildfires (Goforth and Minnich 2008).

The fires of 2007, particularly the Poomacha Fire, burned through areas where DDD trees had been removed along evacuation corridors. The firefighters attributed their ability to keep safe, prevent further forest destruction, and the prevent the Palomar Mountain community from burning, to the removal of DDD trees in 2004-2006 (Thom Porter, CAL FIRE personal communication, 2008;

George Lucia, Valley Center Fire District Fire Marshall who participated in fighting the Poomacha Fire on Palomar Mountain, personal communication, 2008). This is in contrast to the situation in the 2003 Cedar Fire, in which tens of thousands of acres of coniferous forest were destroyed by the fire, including very old trees. Hundreds of homes were burned. Much of the forest that burned in the 2003 fires is not recovering due to the high severity of the fire as a result of tree density and the extraordinary number of trees killed by drought and insects (Goforth and Minnich 2008).

Determination of Treatment Area

In 2002, FAST was formed to address life and property safety concerns related to declining forest health, the increasing number of DDD trees, and shrub vegetation in San Diego County. The taskforce, a collaboration of various government agencies, tribal groups, as well as local, state and federal elected officials, community organizations and private citizens, identified nine priority areas for tree and shrub removal in order to reduce fire hazards to protect life, property, and sensitive habitat.

Following repeated destructive fires in San Diego County in 2003 - 2007, FAST held a series of public meetings in 2008 where a set of criteria, including population, escape routes, safe zones, fuels, degree of hazard, infrastructure, risks of ignition, and ecological sensitivity were considered in ranking the nine priority areas for DDD tree removal. The proposed project was listed as a fourth priority treatment area; it is now the highest priority treatment area since other higher priority areas have been treated.

The Cuyamaca – Laguna, Descanso, Guatay and Pine Valley areas contain a number of oaks that are dying from infestation by the gold-spotted oak borer, and these areas would be the logical extensions of the Greater Julian Area should grant funding remain following treatment of the initial SR 78 and SR 79 corridors and nearby areas. This EIR covers all the areas that would be treated using the $7 million grant, including the areas that would be treated if grant funding remains following treatment of the initial SR 78 and SR 79 corridors and nearby areas.

Gold-Spotted Oak Borer (GSOB)

The gold-spotted oak borer was found in the County in 2008 where it is attacking coast live oak (*Quercus agrifolia*), California black oak (*Q. kelloggii*), and canyon live oak (*Q. chrysolepis*). The GSOB larvae feed on the living cambium layer under the tree bark, which disrupts the water and nutrient flow within the tree. The symptoms of the injury are twig dieback, crown thinning, bark staining, and adult GSOB exit holes. The infested trees eventually die. GSOB infestations have been identified in Julian and surrounding communities, and the Alpine, Pine Valley, Descanso, Morena Village, and Ramona areas.

The proposed project includes the removal of oak trees that the GSOB has killed or is killing. In some cases the removal of dying or diseased trees will physically remove and kill GSOBs; in other cases the remaining trees may benefit from the reduction in competition for resources, allowing the remaining trees to be more able to fight off infestation by the GSOB.

The GSOB[4] is a buprestid beetle that is native to oak forests of southeastern Arizona and was first detected in San Diego County in 2004 by the California Department of Food and Agriculture during a survey for exotic woodborers. In 2008, it was found attacking coast live oaks, canyon live oaks and California black oaks in the Cleveland National Forest. Although elevated levels of oak mortality had been aerially mapped by the USFS in the Cleveland National Forest since 2002, it was not known that GSOB was the cause of such mortality until 2008 when it was officially confirmed as the primary mortality agent. Since 2002, the GSOB has contributed to the mortality of more than 21,500 trees over approximately 1,892 square miles in southern California and this infested area continues to increase as the GSOB population grows and spreads. In its native range of southeastern Arizona, GSOB is not such a pest, perhaps due to efficient population control by natural enemies and to natural levels of resistance by oak species that have co-evolved with GSOB. Although the presence of GSOB in San Diego County could reflect a natural unassisted range expansion by native populations to the east and south, it is more likely that GSOB was inadvertently introduced during the last ten years in oak firewood that originated from areas where this beetle is native.

The GSOB is responsible for major oak mortality on federal, state, private, and Native American lands in San Diego County. Since GSOB's invasion into San Diego County, many negative effects have resulted from GSOB-induced oak mortality to both private and public lands that are now being assessed and quantified. GSOB has resulted in the direct loss of valuable oak trees, especially landscape or heritage trees, increased pest management (monitoring and control) and forest management (removal of dead trees that can fuel wildfires), and emergency responses (removal of hazardous trees in public areas). For example, according to the 2010 Forest Service Forest Health Protection (FHP) Individual Pest Risk Assessment report, between 2008 and 2010 Cuyamaca Rancho State Park used 1,300 person hours removing hazardous oaks in the park. Several campsites were also closed due to hazard tree concerns attributed to GSOB. Finally, there is the loss in property value. Previous studies suggest that oaks contribute from 5 to 30 percent of the appraised values of real estate. Therefore, towns such as Julian, which are dominated by GSOB infested oak woodlands, are being greatly impacted by losses in property values.

Since oaks are keystone species in southern California's woodlands, their widespread loss is also causing detrimental impacts to the natural landscape of this area. Biodiversity is adversely affected due to the loss of habitat and food resources used by native animals, such as acorn woodpeckers, mule deer, ground squirrels, and the arroyo toad. Shading of sensitive riparian areas is being reduced, which threatens water supplies and the existence of animals and plants that rely on this scarce resource. Also, increasing numbers of dead oaks are significantly increasing the fuel load in these areas, which can increase the probability and severity of wildfires in these natural areas. Moreover, the areas affected have experienced a decline in visual resources or aesthetic value because of the large swaths of dead trees.

[4] This information is from the Center for Invasive Species Research at the University of California, Riverside (2011).

Rationale for 500-Foot Treatment Area Width

Extreme Fire Behavior

Wildland fires in San Diego County generally occur in the fall during Santa Ana wind conditions. As in the fire sieges of 2003 and 2007, fire behavior can be extreme. Extreme fire behavior is a level of fire behavior that goes beyond human methods of fire control and prediction (Forest Encyclopedia Network 2011). The erratic nature of extreme fire behavior presents too serious a risk to the lives of ground crews to perform direct attack. Extreme fire behavior is unpredictable even by complex fire behavior models (Albini 1976, Hough and Albini 1978, Rothermal 1983), as cited by the Forest Encyclopedia Network 2011).

Characteristics of extreme fire behavior include:

- very high to extreme rates of spread
- prolific crowning and torching
- fire whirls
- tall, well-developed convection columns
- long flame lengths
- excessive spotting

High rates of spread and long flame lengths are the most common types of extreme fire behavior. Removal of DDD trees up to 500 feet from roads and structures would help deter extreme fire behavior along the major evacuation routes out of the Greater Julian Area. Fire fighters indicate that a safe zone needs to be more than twice the flame length generated by a fire through a particular vegetation community. During the 2003 and 2007 fires forested areas generated flame lengths that were up to 200 feet (Board of Forestry 2003) and flame lengths of up to 250 feet were reported by San Diego County Fire Authority personnel. Therefore, the safe zone needs to be up to 500 feet.

Topography

Much of the project area contains steep topography. DDD trees may burn and fall from steep slopes and roll or slide a long way onto roadways. Steep lands also have a strong effect on fires that burn from below because the flames can be blown up to and across roads. Fire fighting activities above steep slopes need to take into account the distance uphill that flames can carry and heat will project. Firefighters have been killed protecting structures uphill from fire. A firefighter was killed protecting a home above a steep slope in Julian in the 2003 Cedar Fire and five firefighters died protecting a home above a burning steep slope during the 2006 Esperanza Fire in Riverside County.

Fire Fighting Capabilities

As was described above, the importance of removing selected DDD trees for firefighting capabilities is critical. Flame length, the distance between the flame tip and the midpoint of the flame depth at

the base of the flame (generally the ground surface), is proportional to the height of vegetation. Dead trees can generate flame lengths that are 200 feet or more, as discussed above.

Generally accepted federal and state criteria for a fire fighter safety zone are four times the flame height, which is the average maximum vertical extension of flames at the leading edge of the fire front. Occasional flashes that rise above the general level of flames are not considered as the flame height. This distance is less than the flame length if flames are tilted due to wind or slope.

Flame lengths and flame heights that could occur in the San Diego County mountains support the need for removal of DDD trees up to 500 feet from roads and structures, particularly in areas that are up slope from steep terrain with DDD trees.

Strong winds can also carry flames from dead trees horizontally across roads. Santa Ana winds from the northeast may reach speeds approaching 60 miles per hour in this region and may push flames across the road from trees that are burning.

The 500-foot maximum width of the project is less than the 1,800 feet of treatment area allowed by the USFS Land Management Plan for California National Forests. The USFS's plan allows a two zone approach, where the first 300 feet from a structure is rendered non-flammable from a fire protection perspective. The rest of the vegetation out to 1,500 feet is reduced to allow effective fire control operations. In both zones, the goal is to reduce the fire intensity allowing all firefighters a chance for successful firefighting and survival. Reducing the intensity brings the fire from the canopy back to the ground and allows firefighters to work on the fire safely. If the fire is not converted to a ground fire, firefighters will in most cases need to abandon structure protection or suppression activities due to unbearable heat (R. Hawkins Fire Chief Cleveland National Forest, retired, Personal Communication, 2010).

The County program to conduct selected DDD tree removal up to 500 feet from structures and along roads is based on the San Diego County Fire Authority staff's years of experience in wildfire behavior and the benefits of vegetation reduction activities. In addition, in its Forest Practice Rules, the State of California recognizes that dead trees are a hazard when those dead trees are located within 500 feet of structures and on either side of a public or federal road.

Therefore, particularly on steep slopes such as exist within the project area removal of DDD trees up to 500 feet from roads and structures in forested or wooded areas was selected as the effective treatment distance.

DDD Tree Removal Regulatory Compliance

Removing dead, dying and diseased trees is exempt from preparing a timber harvest plan, which generally takes the place of an EIR. The proposed project would conform to the requirements of the California Forest Practice Rules (CFPR) for exempt harvest practices. The CFPR have been established "to implement the provisions of the Z'berg-Nejedly Forest Practice Act of 1973 in a manner consistent with other laws, including but not limited to, the Timberland Productivity Act of 1982, the California Environmental Quality Act (CEQA) of 1970, the Porter Cologne Water Quality Act, and the California Endangered Species Act." The Z'berg-Nejedly Forest Practice Act states that, "it is the policy of this state to encourage prudent and responsible forest resource management calculated

to serve the public's need for timber and other forest products, while giving consideration to the public's need for watershed protection, fisheries and wildlife, and recreational opportunities alike in this and future generations." The CFPR, Section 897, provides the intent of implementing the Z'berg-Nejedly Forest Practice Act, which is to ensure that registered professional foresters (RPFs) "consider the range of feasible silvicultural practices, operation methods and procedures provided in these rules in seeking to avoid or substantially lessen significant adverse effects on the environment from timber harvesting."

Under CFPR Sections 1038(b) and 1038 (d), the removal of DDD trees is exempt from timber harvest plan preparation and submission requirements provided that trees are cut in amounts less than 10% of the average volume per acre. Under 1038(d), the proposed project is consistent with the regulation that the 10% average volume limit does not apply when harvesting dead trees that are unmerchantable as saw-log timber from substantially damaged timberland. Though exempt from a timber harvest plan, the project must adhere to the following conditions identified in the CFPR:

- No tractor or heavy equipment operations on slopes greater than 50%;
- No construction of new tractor roads on slopes greater than 40%;
- Timber operations within any Special Treatment Area[5] shall comply with the rules associated with that Special Treatment Area;
- No tractor or heavy equipment operations on known slides or unstable areas;
- No new road construction or reconstruction;
- No heavy equipment operations within the standard width of a watercourse or lake protection zone, except for maintenance of roads and drainage facilities or structures;
- No known sites of rare, threatened or endangered plants or animals will be disturbed, threatened or damaged;
- No timber operations within the buffer zone of a sensitive species;
- No timber harvesting within the standard width of a watercourse or lake protection zone (WLPZ) except the removal of dead or dying trees[6]; and

[5] *Special Treatment Areas* are defined in the CFPR as specific locations that contain one or more of the following significant resource features which may be at risk during timber operations:

a. Within 200 feet of the watercourse transition line of federal or state designated wild and scenic rivers;

b. Within 200 feet of national, state, regional, county or municipal park boundaries;

c. Key habitat areas of federal or state designated threatened, rare or endangered species;

d. Coastal Commission special treatment areas;

e. Within 200 feet of state designated scenic highways or within scenic corridors established pursuant to Article 2.5 (commencing with Section 260) of Chapter 2 of Division 1 and Section 154 of Chap. 1 of Div. 1 of the Streets and Highways Code.

[6] Such activities must be consistent with 14 CCR 956.4, which provides for the protection of specific features associated with watercourse and lake protection zones. These include water temperature control, streambed and flow modification by large woody debris, filtration of organic and inorganic material, upslope stability, bank and channel stabilization, vegetation structure for fish and wildlife habitat, possibly including but not limited to vertical

- Trees to be harvested shall be marked by, or under the supervision of, an RPF prior to timber operations.

All tree removal work would follow the CFPR for exempt harvest practices, in addition to requirements for treatment of land (e.g., erosion control), operating in wet weather, avoiding stream crossings and courses, and with limitations on how trees are removed on steeper slopes.

The tree removal contractor would also adhere to State and Federal Occupational Health and Safety Codes (OSHA; CAL-OSHA), and would be required to prepare a written accident prevention program addressing fire prevention and worker/public safety.

1.3.2 Project's Component Parts

Tree Removal Processes

The tree removal contractor would be directed to areas that have completed review for DDD tree removal. If there is any potential of confusion between tree removal areas and designated protected areas, the RPF and the tree removal contractor would visit the areas prior to operations, consistent with the California Forest Practice Rules. Dead, dying and diseased tree removal processes include:

- Identification of participating parcels through a notification process;
- Marking of DDD trees that qualify for removal[7];
- Completion of a biological resources and cultural resources surveys to identify any sensitive biological resources or significant archaeological or historic sites to be avoided[8];
- Environmental Awareness Training ;
- Removal of qualifying trees; and
- Site clean-up activities.

Participation in the DDD Tree Removal Program

Prior to completing any field work, notices would be sent to private property owners within the identified project area (see Figure 2) describing the DDD tree removal program. A right-of-entry form would be required from each property owner providing permission for the crews to access the private parcels to complete all steps in the tree removal process. Maps of participating parcels where tree removal operations would take place will be prepared by the County.

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diversity, migration corridor, nesting, roosting and escape, food abundance and snags. This regulation also requires that the WLPZ be appropriately marked or flagged in order to protect the resources associated with the WLPZ.

[7] DDD trees that qualify for removal will be marked by or approved for removal by the County-retained RPF.

[8] Biological and cultural resource surveys have been completed for parcels whose owners had chosen to participate in the dead, dying and diseased tree removal program before this EIR was determined to be required. The results of these surveys can be found in the *San Diego County Hazardous Fuels Reduction Project - Greater Julian (Whispering Pines and SR 78-79 Corridor) Area Biological Resources Report* prepared by Merkel & Associates, Inc. (October 2010) and the *Inventory of Cultural Resources for the County of San Diego Fuel Reductions Program in Julian, Cuyamaca, and Descanso, San Diego, California* prepared by ASM Affiliates, Inc. (May 2010). Additional surveys will be conducted for any participating parcels that are added following project re-notification (see footnote 4).

Qualifying DDD Tree Identification

Qualifying DDD trees on each participating parcel would then be identified and marked under the direction of the County-retained RPF. RPFs are licensed by the State of California under Title 14, Division 1.5., Chapter 10 of the California Code of Regulations through a rigorous experience and testing program in California and their licenses are subject to review by the California Board of Forestry. They are trained to identify dying trees in a forest setting and can distinguish between seasonal leaf loss and near death. They are specifically certified to understand tree health and a tree's potential for survival in a forest setting. The identification of dead trees would be conservative in that any tree with a potential for surviving would remain, and only trees which are clearly dead or near death would be removed.

The only trees marked in this program would be those that are already dead or dying as determined by the RPF. Not all the DDD trees on all the participating parcels would be removed. Trees housing wildlife would not be removed and trees that could injure a tree cutter during the removal process would not be removed. Leaving these trees would provide snags for roosting and nesting in the proposed project area, as will the DDD trees remaining on the properties whose owners choose not to participate in the program. Because of the 2003 – 2007 fires, drought, and GSOB infestations, many DDD trees will remain in the Greater Julian Area outside of the proposed project area.

Biological Resources Surveys

Biologists who are on the County's approved consultant list or working under the direct supervision of a biologist on the County's list (herein referred to as consulting biologist) would conduct a biological resources assessment on each participating parcel that would include the following tasks:

1. Create a list of special-status plant and animal species including characteristics of their habitats that have the potential to occur within the project area. Special status species are those that are listed in state, federal or county lists of sensitive species. The following documents would be used:
    a. The California Department of Fish and Game (CDFG) California Natural Diversity Data Base (CNDDB);
    b. CDFG Special Animals List;
    c. CDFG State and Federally Listed Endangered, Threatened, and Rare Plants of California;
    d. The Status of Rare, Threatened, and Endangered Plants and Animals of California 2000-2004 (CDFG 2005);
    e. California Inventory of Rare and Endangered Plants (current on-line version);
    f. The Jepson Manual (Hickman 1993 or most recent edition), and various online resources (e.g., Cal Flora); and
    g. The County's lists of sensitive plants and animals.

2. Evaluate Critical Habitat for potentially occurring federally listed species.
3. Since some plant species grow in specific soil types, determine the soil types by using the Natural Resource Conservation Service's Web Soil Survey (located at http://websoilsurvey.nrcs.usda.gov).
4. After determining the potentially occurring species from tasks 1-3 above, the consulting biologist would conduct on-foot reconnaissance level biological surveys of the treatment portion of each participating parcel. The surveys will follow the most current County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Biological Resources.
5. Field surveys would include:
    a. Identifying and recording plant and animal species observed or detected on participating parcels;
    b. Searching for sensitive plants;
    c. Searching for reptiles and amphibians under rocks and woody debris;
    d. Searching for animal signs (e.g., scat, tracks);
    e. Searching for active nests (or nests as defined in section 895.1 of the California Forest Practice Act – i.e., certain raptor nests known to be occupied within the last five years);
    f. Examining burrows and other special habitat features;
    g. Recording the locations of special status species with GPS and taking representative photographs of the sites; and
    h. Assessing the presence of Resource Protection Ordinance (RPO) sensitive habitat lands.
6. Map and document all existing and newly identified locations of special status species.
7. Prepare a report describing the results of the survey and submit it to the County, and also submit appropriate documentation to the CNPS and CNDDB databases.

Following the field inspection of all participating project parcels, the consulting biologist would identify the sensitive biological resources that have potential to be affected by the tree removal operations in a draft biological resources assessment report. The report would be reviewed by a County staff biologist. A subsequent field visit would be conducted by the consulting biologist and County-retained RPF to inspect each site and evaluate whether avoidance measures are needed to protect identified sensitive resources. Areas supporting sensitive biological resources that could potentially be affected by the DDD tree removal activities would be identified on the project maps as Special Treatment Areas and would be avoided during tree removal activities.

Any locations identified as containing wetland or riparian habitats, including but not limited to freshwater marsh, southern riparian forest, southern coast live oak riparian forest, southern riparian scrub, or southern willow scrub, would be identified by the consulting biologist as Special Treatment Areas and deleted from the treatment area map. Additionally, tree removal markers placed on the trees that are being considered for removal would be removed from DDD trees that

support sensitive plant or animal species or trees that are being used as nesting or den sites, and those trees would be left undisturbed. Depending on the circumstances, biologically sensitive areas would also be flagged or temporarily fenced with orange snow fencing on the ground to further guarantee avoidance of those areas. The consulting biologist would document the areas to be avoided in the final biological resources assessment report.

The biological survey information for biologically sensitive areas would be checked by the County, the U.S. Fish and Wildlife Service (USFWS), and the CDFG for compliance with the DDD Tree Removal Program EIR, and applicable regulations. These agencies may identify additional measures and/or the avoidance of other proposed DDD tree removal areas in order to comply with applicable regulations or to avoid adverse effects to a specific species from tree removal activities. Trees would be removed from the program if there is the potential for a "substantial" impact that was not evaluated in this EIR. County staff would make this determination under Section 15162 of the CEQA Guidelines.

Cultural Resources Surveys

Archaeologists on the County's approved list of consultants or working under the direct supervision of an archaeologist on the County's list (herein referred to as consulting archaeologist) will conduct an assessment of cultural resources for the participating parcels. The assessment will include:

1. A record search for known cultural resources and previous reports at the South Coastal Information Center at San Diego State University, local historical societies, and other repositories. Oral histories will also be procured. Aerial photos and historic maps will be reviewed to identify potentially historic structures and historic land uses. Consultation with the Native American Heritage Commission and local Native American representatives will be conducted.
2. A 100 percent pedestrian survey within the treatment portions of the participating parcels. The surveys will follow the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Cultural Resources Archaeological and Historic Resources.
3. Mapping and documenting all existing and newly identified prehistoric and historic sites, features, structures, and isolates identified during the surveys.
4. A report documenting the results of the surveys on the participating parcels. If significant cultural resources are discovered, appropriate documentation would be submitted to the South Coastal Information Center at San Diego State University for assignment of permanent primary numbers and trinomials to the found resources.

The consulting archaeologist would document the results of the field assessment in a draft cultural resources assessment report. If significant cultural resources were found during the field assessment, a subsequent field visit would be conducted with the County staff archaeologist, the consulting archaeologist, the Native American monitor (as determined necessary by the consulting archaeologist), and the County-retained RPF to inspect each site and evaluate the avoidance measures needed to protect the significant cultural resource. Areas supporting sensitive cultural

resources that could potentially be affected by the DDD tree removal activities would be deleted from the treatment area map. Additionally, tree removal markers would be removed from DDD trees that are in locations that should be left undisturbed due to adjacent sensitive cultural resources. Depending on the circumstances, culturally sensitive areas would also be flagged on the ground or temporarily fenced with orange snow fencing to further guarantee avoidance. The consulting archaeologist would incorporate any field developed mitigation measures into the final cultural resources assessment report.

Dead trees located within a significant cultural resource site may be identified by the consulting archaeologist to be removed, if based on tree size the removal is feasible without impacting the integrity of the cultural resource. The tree would be cut into smaller pieces and hand carried out of the significant cultural resource site. No duff, leaf litter, soil or other materials would be removed from within the cultural resource site; only the limbs and branches (slash piles) that are cut from marked dead trees would be taken away. Dead trees located in close proximity to a significant cultural resource site would be directionally felled away from the cultural resource site.

If new cultural material is discovered during tree removal operations, all operations would stop and the County staff archaeologist would be notified. Prior to resuming operations the County staff archaeologist, along with the consulting archaeologist(s) and Native American monitor(s), would schedule a field review with the RPF and the tree removal contractor to determine appropriate avoidance and protection measures.

Environmental Awareness Training

Prior to the commencement of tree removal operations, all tree removal workers would attend a one-hour environmental awareness training given by the consulting biologist and consulting archaeologist. The purpose of this training would be to provide field employees with a basic awareness of the types of sensitive biological and cultural resources occurring in the project area, and an understanding of the environmental conditions and mitigation measures to be adhered to during all tree removal operations.

Protection of Sensitive Biological and Cultural Resources

The tree removal contractor would be given maps that identify the properties that have completed the review for DDD tree removal. Those areas identified for special treatment to protect sensitive biological or cultural resources would be identified on the map and the project description for the DDD tree removal contract would identify the specific protection measures the tree removal contractor must implement at the location. The Forest Practice Rules require the RPF to show all archaeological and biological special treatment sites to the tree removal contractor prior to operations.

The tree removal contractor would be directed to areas that have completed review for tree removal. If there is any potential of confusion between tree removal areas and designated protected areas, the RPF and the tree removal contractor would visit the areas prior to operations, consistent with the California Forest Practice Rules.

Noticing of When DDD Trees Will Be Removed

The County will post notices on its website of generally where and when the DDD trees would be removed. The actual date of DDD tree removal from any particular parcel is determined in the field each day based on restrictions posed by weather conditions, accessibility, and crew schedules, and cannot be determined in advance.

DDD Tree Removal

The tree removal contractor may only cut marked DDD trees in presence of the RPF or the RPF's trained staff. All other related DDD tree removal work would be monitored daily by the RPF or his/her trained staff.

The tree removal contractor would determine the method of removal for each DDD tree to be removed. If the tree is associated with a Special Treatment Area, biological resource or cultural resource avoidance measures identified in the contract would be followed.

Tree removal activities may include free falling, where the tree is cut at the base and directed to fall to the ground. If the tree is impeded, such as being close to a structure, it may be cut into segments from the top down, either through the use of a crane or a truck with an extendable bucket, the cut pieces being lowered or let fall to the ground. Safety of the tree cutters would be a primary factor in determining which method is used.

Once cut, tree pieces would be assembled with rubber-tracked or rubber-wheeled equipment, picked up in the bucket of the tractor, or dragged to a landing area.

The disturbance of understory vegetation would be limited to a) that needed for a person with a chain saw to reach an individual DDD tree; b) to the area for the felling of the tree; and c) to the path of the log extraction (skid trails), which may include the area needed for rubber-tracked or -wheeled equipment to reach the downed tree. All sensitive biological resources and significant cultural sites would be avoided during the felling of the DDD trees.

Small trees could be chipped and spread on the participating parcel within the area of work for the tree removal, or would be moved to the wood debris staging site. Chipped mulch left on the participating parcel would not exceed two inches in depth, would not be stockpiled, and would not be placed in waterways or drainage devices. No slash would remain on the participating parcels and no chips would be left to rest within six feet of a live tree.

Dead, dying or diseased trees marked for removal along grassland and meadow edges, or intergraded within scrub or chaparral habitats, would be felled away from these habitats where feasible, with log extraction through areas without sensitive biological resources or significant cultural sites.

Treatment of Conifer Stumps

Approximately 10 percent of the DDD trees that would be removed are conifers. Stumps of conifer species would be treated with Sporax®, which contains sodium tetraborate decahydrate (borax) and is used to treat annosum root disease. Annosum root disease is caused by the fungus *Heterobasidion annosum*, which infects cut conifer stumps following thinning or cutting operations

(USDA Forest Service 2006). Treatment of conifer tree stumps with Sporax® prevents annosus spores from establishing infections in tree stumps and spreading through their root systems to other trees. Oak stumps would not be treated with Sporax® because the disease does not affect oaks.

Treatment of Oak Trees

Due to the presence of GSOB in the Greater Julian Areas, special treatment to reduce the risk of transporting oak wood containing GSOB to previously uninfested areas is required. The following measures would be implemented:

- Oak tree pieces would not be unloaded at any location within a five mile radius of where live oak trees exist, except at the designated wood debris staging site(s) for grinding.
- Oak tree wood chips, resulting from grinding or chipping, can be spread on a participating parcel at a depth no greater than two inches.

Temporary Work Areas and Easements

Temporary work areas to remove DDD trees would be located within existing clearings or open areas or developed portions of each participating parcel. Temporary work areas also may include use of SR 78 and SR 79 road shoulders and/or temporary closure of a travel lane for access and tree removal staging. The tree removal contractor would be required to obtain traffic control permits from the appropriate agency (i.e., San Diego County Department of Public Works for County roads, and the California Department of Transportation (Caltrans) for SR 78 and SR 79.

All vehicles and heavy equipment would remain on pre-existing roads, trails, and parking areas to the extent practical. No roads would be created for this project.

Temporary work areas would also include wood debris staging sites for the processing of removed trees. Each staging site would be less than 0.9 acre.[9] It is anticipated that only one wood debris staging site would be used at a time, and that the tub grinder (the noisiest piece of equipment) would be moved from one staging site to another every two to three months in order to assure that equipment noise generated at any individual staging site is considered temporary pursuant to the County's Noise Ordinance.

The Julian bin site (Figure 4) operated by the County is an example of a site that has the characteristics needed for a wood debris staging site. Wood debris staging sites proposed by the contractor would be reviewed and approved by the County before tree removal operations begin and must meet County zoning, land use requirements, and storm water regulations. As with the DDD tree removal locations on private properties, cultural resource and biological resource assessments would be conducted for the wood debris staging sites prior to use. The wood debris staging sites would not be located in sensitive natural communities, including but not limited to freshwater marsh, southern riparian forest, southern coast live oak riparian forest, southern riparian scrub, southern willow scrub, Diegan coastal sage scrub, foothill/mountain perennial

[9] The wood staging operation area would be 0.9 acres or less to be under the one-acre size for permits from and reporting to the Regional Water Quality Control Board.

grassland, or mafic[10] northern mixed chaparral. Equipment used at the wood debris staging sites would meet current state and federal standards.

All project-generated wood would be removed from the wood debris staging site within 20 days following the last tree felled. An estimated 43,200 cubic yards of chipped and/or solid wood would be hauled offsite for use at the Colmac Energy Biomass-Fueled Power Plant in Mecca, California. No other use of the wood debris would be allowed.

Dust Control during Project Operations

The tree removal contractor would implement the following dust control measures during all tree removal activities:

- Any visible vehicle/equipment track-out onto traveled public streets would be removed twice a day, as appropriate for crew safety;
- Haul trucks would be covered or would maintain at least 12 inches of freeboard to reduce blow-off during hauling;
- Paved approach routes to tree removal sites would be washed with a water truck or swept clean daily of construction-related dirt in dry weather; and
- A 20 mile-per-hour speed limit would be enforced on unpaved surfaces.

Fire Safety

The tree removal contractor would be required to adhere to all State and County regulations and requirements for fire suppression, including adherence to the Fire Danger Level conditions associated with each day of work. Such conditions include provision of a fire tool box for each operating crew, the provision of a water source for fire suppression, and identification of a dedicated Fire Patrol person for each operating crew.

Site Clean-up

The soils where DDD tree removal activities and equipment have operated would be smoothed by raking existing duff and natural materials over the disturbed area. All temporary access routes, landings for tree work, and skid trails for log extraction would be rehabilitated with erosion control measures.

Temporary trails that enter a public roadway would be blocked after project completion, using a combination of natural barriers (e.g., rocks, logs, etc.).

For wood debris staging sites, original grades onsite would be re-established, if needed, and passively re-colonized by raking existing duff and natural materials over the disturbed area.

In those areas requiring the removal of fences, the tree removal contractor would be responsible for removal of the segments of fencing and, within two days of completion of work in the immediate area, replacement of the fence to its original location and condition.

[10] Related to a silicate mineral or rock that is rich in magnesium and iron. Soils derived from mafic rocks support unusual plants and plant communities.

Project Workforce

The project would require three or more separate tree removal contracts, each of which will include a maximum of six to 12 five-person crews operating concurrently. During the tree removal period, an estimated 20,000 DDD trees would be removed from the Greater Julian Area. If funds remain after the 20,000 DDD trees are removed, the crews will move to the next priority area.

The number of tree removal crews operating during project implementation is anticipated to range between six and 12; therefore, the number of workers necessary for implementation of the proposed project would range from 30–60, with each crew typically composed of five workers. Workers would park at appropriate public locations in or near the project work site.

Equipment

Tree removal equipment would include, but would not be limited to: chainsaws, passenger trucks, tractors, skid steer loaders, wood debris transport trucks, wheeled loaders, leaf blowers, water tenders, brush/wood chippers, bucket truck for tree removal, and a wood chipper/grinder. An equipment service vehicle would carry fuel containers (i.e., gasoline and diesel), spare parts, spare hand tools, and may contain a gas-powered air compressor for maintaining equipment.

Prior to operations, either the County Fuels Reduction Management Contractor or San Diego County Fire Authority personnel would inspect all contractor project equipment for general condition and compliance with State and Federal regulations. The tree removal contractor would inspect all equipment for cleanliness and remove any propagules (seeds or plant parts) of weed species prior to equipment entering the project area in accordance with the USFS Guide to Noxious Weed Prevention Practices.

Project Schedule

Contract issuance will be staggered with each of three contracts having a 90 "working day limit". Implementation of the proposed project is estimated to require approximately 260 work days over a 13 month duration[11]. In general, work hours would be from 7:00 a.m. to 5:00 p.m., Monday through Friday, on participating private parcels. Saturday work may occur, but would be limited to the wood debris staging sites.

Work would not occur when the ground is wet enough to restrict equipment use, or when soils are saturated. Work would not be allowed to occur when snow hinders safety or maneuverability or when the ground is wet enough for equipment and vehicles to cause damage when driven on it. Additionally, work may not occur if site conditions, such as combination of temperature, wind, and humidity, are such that an increased risk of fire and work force safety exists.

[11] A total of 90 working days by individual crews may be spread out over a longer period in order to accommodate delays associated with weather (e.g., high winds, snow, excessive rain, and saturated soil conditions) or fire conditions.

Operations and Maintenance

Normal operations and maintenance activities will occur during the tree removal program. Upon completion of the tree removal treatments, no additional operations and maintenance activities associated with the proposed project would remain.

1.3.3 Technical, Economic, Environmental Characteristics

Technical Characteristics

Relevant technical aspects of the project include the provision of water and sanitation services for the project.

Water Supply

The Contractor would be responsible for securing the water to be used for the project for fire tenders, backpack pumps, dust control, etc. Potential water sources options include purchase of or arrangement for water from a local source such as a property owner, local fire department, or water agency.

Sanitation Services

The Contractor would be responsible for providing and maintaining enclosed toilets for the use of employees, and would comply with all applicable laws, ordinances, and regulations pertaining to public health and sanitation of dwellings and camps.

Economic Characteristics

The proposed project would be funded by a $7 million grant from the USFS. No more DDD trees than could be removed with this funding would be removed by this proposed project. Approximately 20,000 DDD trees could be removed within this economic limitation. The grant funding ends on March 31, 2013.

Environmental Characteristics

The following design features have been incorporated into the proposed project in response to environmental constraints, to avoid potential impacts on environmental resources, or to bring the project in compliance with local, state and federal regulations. Should the County of San Diego approve the proposed project, the following conditions and restrictions would be included in the contract statements of work with tree removal service providers. The following specific design features are divided by resource area and shall be conditions of approval of the contract statements of work associated with the proposed project. These design considerations are relied on for regulatory compliance and are found in Chapter 7, "List of Mitigation Measures and Environmental Design Considerations."

As a condition of the contract with the tree removal contractor, and subject to contract termination, the following requirements must be met:

Air Quality

- The reuse of woody debris and biomass through burning in open-air curtain burners and/or other incineration not classified as a diversion by the California Integrated Waste Management Board (CIWMB) shall be prohibited.
- Visible track-out from public streets shall be removed twice a day, as appropriate for crew safety.
- Haul trucks shall be covered or maintained with at least 12 inches of freeboard to reduce blow-off during hauling.
- Approach routes to tree removal sites shall be cleaned daily during dry weather.
- A 20 mile-per-hour speed limit shall be adhered to on unpaved surfaces.

Biological Resources

- A biological resources survey shall be conducted on each participating parcel prior to initiating DDD tree removal activities. Areas with sensitive biological resources that have the potential to be affected by DDD tree removal activities shall be deleted from the treatment area map and avoided.
- No heavy equipment would be driven or placed in wetland or riparian habitats, including but not limited to freshwater marsh, southern riparian forest, southern coast live oak riparian forest, southern riparian scrub, or southern willow scrub.
- Within ten days before felling, each DDD tree marked for removal would be inspected by a qualified consulting biologist for the presence of active nests or other animal lodgings, and if such is detected, the tree would not be removed. Individual trees found to support active nests or other animal lodgings would be remarked as “no cut” or “wildlife” trees, and will not be removed.
- Prior to the commencement of DDD tree removal operations, all tree removal workers would receive environmental awareness training regarding sensitive biological resources that occur in the project area and related project conditions and mitigation measures.

Cultural Resources

- A cultural resources survey shall be conducted on each participating parcel prior to initiating tree removal activities. Areas of cultural resources determined to be significant by the County archeologist will be protected and avoided by excluding tree removal activities.
- Prior to the commencement of tree removal operations, all tree removal workers would receive environmental awareness training regarding cultural resources that may occur in the project area and related project conditions and mitigation measures.

Traffic-Project Access

- No new road construction or reconstruction shall occur.

- The contractor shall obtain traffic control permits from the appropriate agency for all work within public roadways.
- All vehicles and heavy equipment shall use only existing developed roads and parking areas to the extent practical.
- All temporary access routes, tree fall landings, and log extraction skid trails shall be rehabilitated per the California Forest Practice Rules following use.
- Temporary trails that enter a public roadway would be blocked, using a combination of natural barriers (e.g., rocks, logs, etc.), after project completion.
- Existing fences or barriers that are damaged during the tree removal process shall be repaired by the tree removal contractor.

Hazards and Hazardous Materials

- A written accident prevention program addressing fire prevention and worker/public safety shall be prepared.
- The contractor shall adhere to all State and Federal Occupational Health and Safety Codes (OSHA and Cal-OSHA).
- The contractor shall adhere to all County regulations and requirements for fire suppression, including adherence to fire danger level restrictions and conditions.

Hydrology and Water Quality

- Tractor or heavy equipment operations shall be prohibited on slopes greater than 50% and on known slides or unstable areas.
- Erosion control measures shall be implemented consistent with California Forest Practice Rules requirements.

1.4 Project Location

As shown on Figures 1, the proposed project is located on lands adjacent to SR 78 and SR 79, including Whispering Pines, within the Greater Julian Area, which encompasses the unincorporated area of San Diego County from north of Mesa Grande on State Route 76 to south of the intersection of SR 79 and Highway S2, including Volcan Mountain; to the bottom of Banner Grade on SR 78; south to Cuyamaca and west; and including Pine Hills and Santa Ysabel. Whispering Pines (east of SR 78 in the Banner Road area) is also included in the treatment area. Parcels where DDD trees are expected to be removed are illustrated on Figure 2. If funds remain after treating the Greater Julian Area, the Cuyamaca – Laguna, Descanso, Guatay and Pine Valley areas, which also contain a number of oaks that are dying from gold-spotted oak borer infestation, would be treated. These additional areas that may be treated if funds remain are shown on Figure 3. The impacts evaluated in this EIR address the Greater Julian Area, as well as the Cuyamaca – Laguna, Descanso, Guatay and Pine Valley areas.

1.5 Environmental Setting

1.5.1 Existing Physical Site Conditions

The proposed project is located in rural eastern San Diego County. Elevations in the Greater Julian Area range from 2,900 feet to 4,700 feet above mean sea level (amsl). Topography ranges from relatively flat to steep lands that may exceed 25% slope. Existing vegetation ranges from forest (coniferous, oak and mixed) to chaparral, grassland and meadows, and riparian habitats. The region has been subjected to a prolonged drought with record dry conditions over the past 13 years.

Additional project-specific environmental setting discussions are provided in Chapters 2.0 and 3.0.

1.5.2 Surrounding Land Use and Development

Lands within the project area and surrounding lands support a variety of uses that range from rural residential landscapes with individual structures and houses located on lots ranging from 4 to 20 acres and larger, to higher density development located in the urban fringe of Julian or within other country towns. Some of the land is rangeland for cattle while other is undisturbed natural lands.

1.5.3 Circulation

The main highways within the vicinity of the treatment area are SR 78, SR 79 and County road S2. SR 78 and SR 79 are the primary regional access routes connecting the eastern portions of unincorporated San Diego County to the urban areas of San Diego, and also serve as the major evacuation corridors from the project area in the event of an emergency.

1.6 Intended Uses of the EIR

This Draft Environmental Impact Report (EIR) for the Strategic Removal of Selected Dead, Dying and Diseased Trees in the Greater Julian Area is an informational document that will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (§15121(a)). This Draft EIR has been prepared in accordance with the guidelines for the preparation of EIRs issued by the County of San Diego in compliance with all criteria, standards, and procedures of the California Environmental Quality Act (CEQA) of 1970 as amended (PRC 21000 *et seq*.). Per §21067 of CEQA and §15367 and §15050 through §15053 of the State CEQA Guidelines, the County is the Lead Agency under whose authority this document has been prepared.

This EIR is a project EIR, because the discretionary actions are for site-specific approval, as compared to a Program or Master Program approval. It focuses on the changes in the environment that would result from implementation of the dead, dying and diseased tree removal program, and is to be used by the County of San Diego to assess the environmental impacts associated with such changes.

The most recent technical studies, reports, and supporting documentation that were used in preparing this Draft EIR are available for review at the County of San Diego DPLU, located at 5201 Ruffin Road, Suite B, San Diego, CA 92123. These appendices include a biological resources survey and a cultural resources survey of the parcels whose owners chose to participate in 2009, but the

rights-of-entry letters from those parcel owners have expired. Once this EIR has been certified, new notices explaining the program will be sent to owners of all qualifying parcels, and biological and cultural resources surveys will be conducted on any participating parcels that have not been surveyed. A list of reports contained in the Technical Appendices is set forth in the Table of Contents to this Draft EIR.

A Notice of Preparation (NOP) for the Draft DEIR, including a description of potential adverse impacts of the proposed project, was distributed to the State Clearinghouse, responsible agencies, and other interested parties on November 18, 2010. The NOP was distributed to identify and determine the full range and scope of environmental issues of concern so that these issues could be fully examined in this Draft EIR. A copy of the NOP and written comments received by the County of San Diego during the NOP process are in Appendix A to this Draft EIR.

1.6.1 Project Environmental Review Chronology

- In May 2009, the County Board of Supervisors accepted a $7,000,000 grant from the U.S. Forest Service for implementation of the proposed project relying on an emergency exemption under CEQA.
- In the summer of 2009, a lawsuit was filed by the Chaparral Institute challenging the CEQA determination.
- In April 2010, a judge ruled in favor of the Chaparral Institute and required the County to prepare, circulate and consider a legally adequate EIR or otherwise comply with CEQA.
- In July 2010, the County released a Negative Declaration (ND) for the proposed project. Based on the comments received on the ND, the County decided to prepare this EIR.

1.6.2 Matrix of Project Approvals/Permits

This EIR will be used for the following approvals:

Discretionary Approvals	Agency/Agencies
Funding Approval	County of San Diego
Contracting Approval	County of San Diego

1.6.3 Related Environmental Review and Consultation Requirements

State law requires that all EIRs be reviewed by trustee and responsible agencies. A Trustee Agency is defined in §15386 of the State CEQA Guidelines as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California." Per §15381 of the State CEQA Guidelines, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval of power over the project." For the proposed project, the CDFG has been identified as a Trustee Agency. CDFG is responsible for reviewing the proposed project and this Draft EIR for consistency with the

California Endangered Species Act and the State Fish and Game Code. There are no identified Responsible Agencies for the project.

1.7 Project Inconsistencies with Applicable Regional and General Plans

State CEQA Guidelines §15125(d) require that several types of regional plans be assessed for potential project inconsistency. Table 1.1, *Consistency with Applicable Regional and General Plans*, lists the applicable regional and general plans that were reviewed for the proposed project. No inconsistencies with any regional plans were identified.

Table 1.1. Project Inconsistencies with Applicable Regional and General Plans

Plan/Policy/Regulation	Inconsistencies
San Diego County General Plan	No inconsistencies found
Julian Community Plan	No inconsistencies found
Pine Valley Community Plan	No inconsistencies found
Zoning Ordinance	No inconsistencies found
Resource Protection Ordinance	No inconsistencies found
San Diego Air Pollution Control District (APCD) Regional Air Quality Strategy (RAQS)	No inconsistencies found
Regional Water Quality Control Board (RWQCB) Water Quality Control Plan and Basin Plan	No inconsistencies found

1.8 List of Past, Present, and Reasonably Anticipated Future Projects in the Project Area

The purpose of identifying projects in the project area is to allow for discussion of the potential for cumulatively considerable impacts to result from the proposed project when added to impacts of past, present, and reasonably anticipated future projects in the Greater Julian Area. Cumulatively considerable impacts means that the effects of the project are considerable when viewed in connection with past, current, and probable future projects (CEQA §15130(a)). The CEQA Guidelines also state that cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (CEQA §15355(b)).

No projects that would remove only DDD trees are known in the Greater Julian Area. One such project does exist in the Descanso Area: the "D3" Oak Tree Mortality and Fuels Reduction Program established by the Resource Conservation District (RCD) of Greater San Diego County. This project is in the portion of the project area that would be treated if funds remain after work is completed in the Greater Julian Area.

Landowners in the Greater Julian Area may choose to have local tree service companies remove some of the DDD trees on their parcels or they may remove DDD trees themselves. Private landowners are not required to analyze the environmental impacts of maintaining their properties through the removal of DDD trees and there is no way to determine how many DDD trees are privately removed.

Discretionary projects in the Greater Julian Area may remove some DDD trees and may also remove live trees; therefore, a list of discretionary projects that require or required permits from the County DPLU and that could remove DDD or healthy trees was assembled and the impacts of those projects were considered during the cumulative analysis for this EIR. Those projects are listed in Table 1.2 at the end of this chapter. The list includes administrative permits completed within the past two years, other permits completed within the past five years, and permit applications currently open (reasonably anticipated) at the County DPLU. The list excludes cellular towers and other projects that would not remove trees. Cumulative impacts are analyzed under each subject area in Chapter 2.

1.9 Growth Inducing Impacts

CEQA requires that every project include a discussion of the project's potential to be growth inducing. The State CEQA Guidelines identify a project as growth-inducing if it would foster economic growth or population growth, or result in the construction of new housing, either directly or indirectly, in the surrounding environment (State CEQA Guidelines, Section 15126.2 (d)). New employees from commercial development, schools, golf courses, and new population from residential development represent direct forms of growth. Indirect forms of growth include the demand for additional goods and services associated with the increase in project population that would reduce or remove barriers to growth in other nearby locations.

The proposed project involves implementing a short-term DDD tree removal program. Tree removal contractors and County support personnel may stay in local motels or rental housing in the proposed work area for the duration of the project; however, the proposed project could not foster long-term economic growth or population growth, or result directly or indirectly in new development by extension or improvement of services, economic stimulus, or revision in land use policies. Therefore, the proposed project would not result in growth inducing impacts.

Table 1.2. Cumulative Project List

Project Name, Permit Type and Permit Number	Year Latest Permit Processing at DPLU Completed	Potential to Impact Biological Resources	Potential to Impact Cultural Sites
Camp Cedar Glen Major Use Permit - Modification / Deviation 72-490-06	In Process	0.03 acre willow scrub; 7.3 acres evergreen forest; 0.6 acre coastal sage scrub; 1.8 acres buckwheat scrub; 0.7 acre non-native grassland; raptor foraging habitat.	Yes
Hoskings Ranch Tentative Map 5312	In Process	451 acres or 230 acres of native plant communities depending on which of two project scenarios is built; habitat for several special status plant and animal species, none of which are federally or state listed.	No
Sentre Partners Agricultural Grading Permit L-15543	In process	1.6 acre oak woodland; 32.5 acres montane chaparral; 3 acres montane ceanothus chaparral.	No
Las Robles Ranch Tentative Parcel Map 21177	In Process	No	Yes
Apache Drive Administrative Permit 06-014	2006	No	No
Drewery Residence Site Plan - Modification/Deviation 88-128-01	2006	No	No
Gallo Guest House/Garage Site Plan - Modification/ Deviation 01-049-01	2006	No	No
Edinger Site Plan 07-017	2007	No	No
Mountain Retreat Site Plan 05-073	2007	No	No
Girl Scouts San Diego Imperial Council Major Use Permit Modification/Deviation 72-460-12	2008	No	Yes
Seger Second Dwelling Unit Administrative Permit 09-021	2009	No	No
Smothers Site Plan Modification 88-152-02	2009	No	No
Camp Stevens Major Use Permit - Modification/ Deviation 84-007-10	2010	No	Yes
Robinson Second Dwelling Unit Administrative Permit 10-007	2010	No	Yes
Whispering Winds Catholic Center Major Use Permit - Modification/Deviation 85-078-06	2010	No	No
Daniel Site Plan Minor Dev Site Plan 91-028-0	2011	No	No
Julian Cuyamaca Fire Station Site Plan 10-004	2011	<1 acre of non-native grassland.	No

Figure 1. The Greater Julian Area in San Diego County as Defined by the FAST

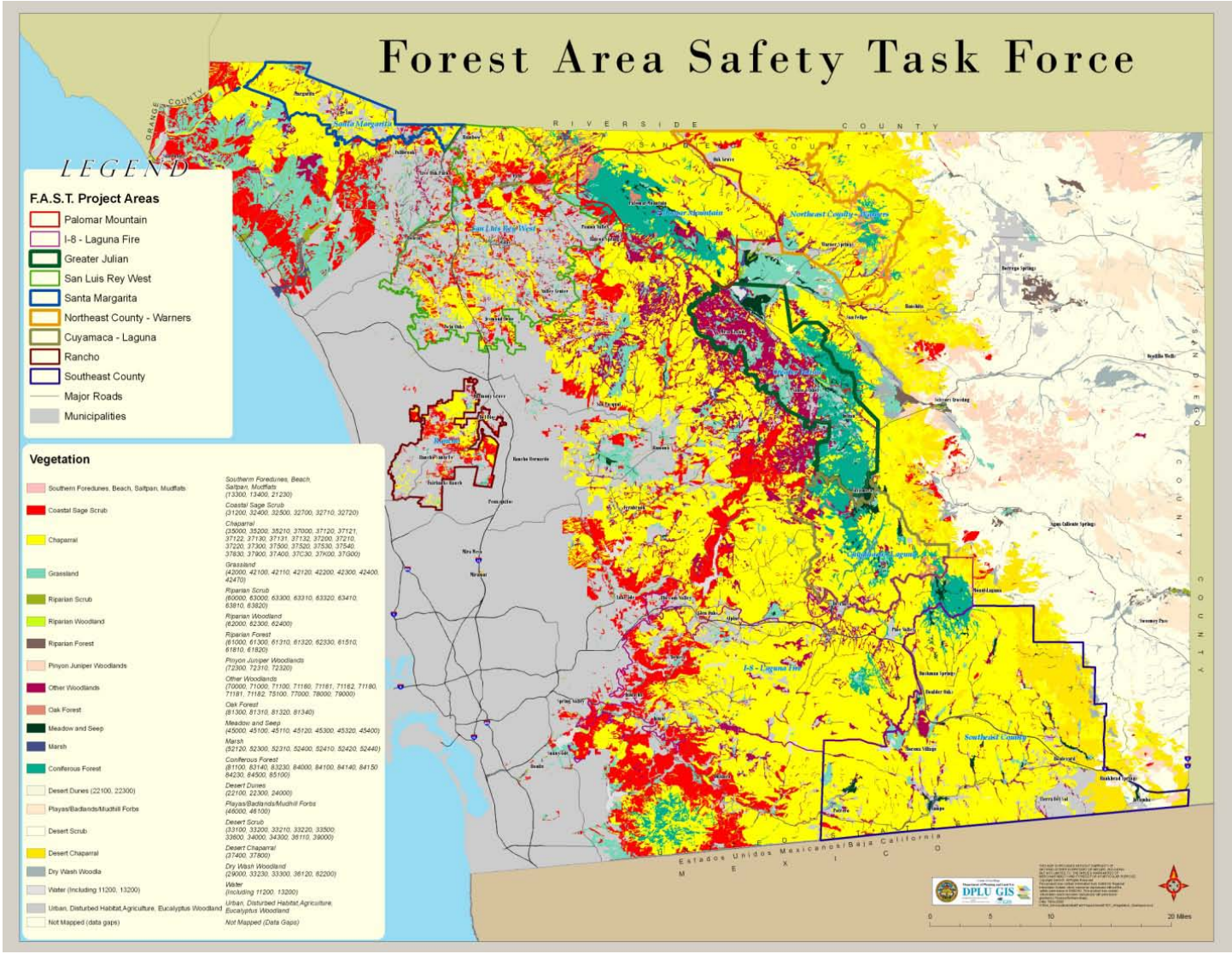

Figure 2. Example of Parcels where DDD Trees Would Be Removed in the Greater Julian Area

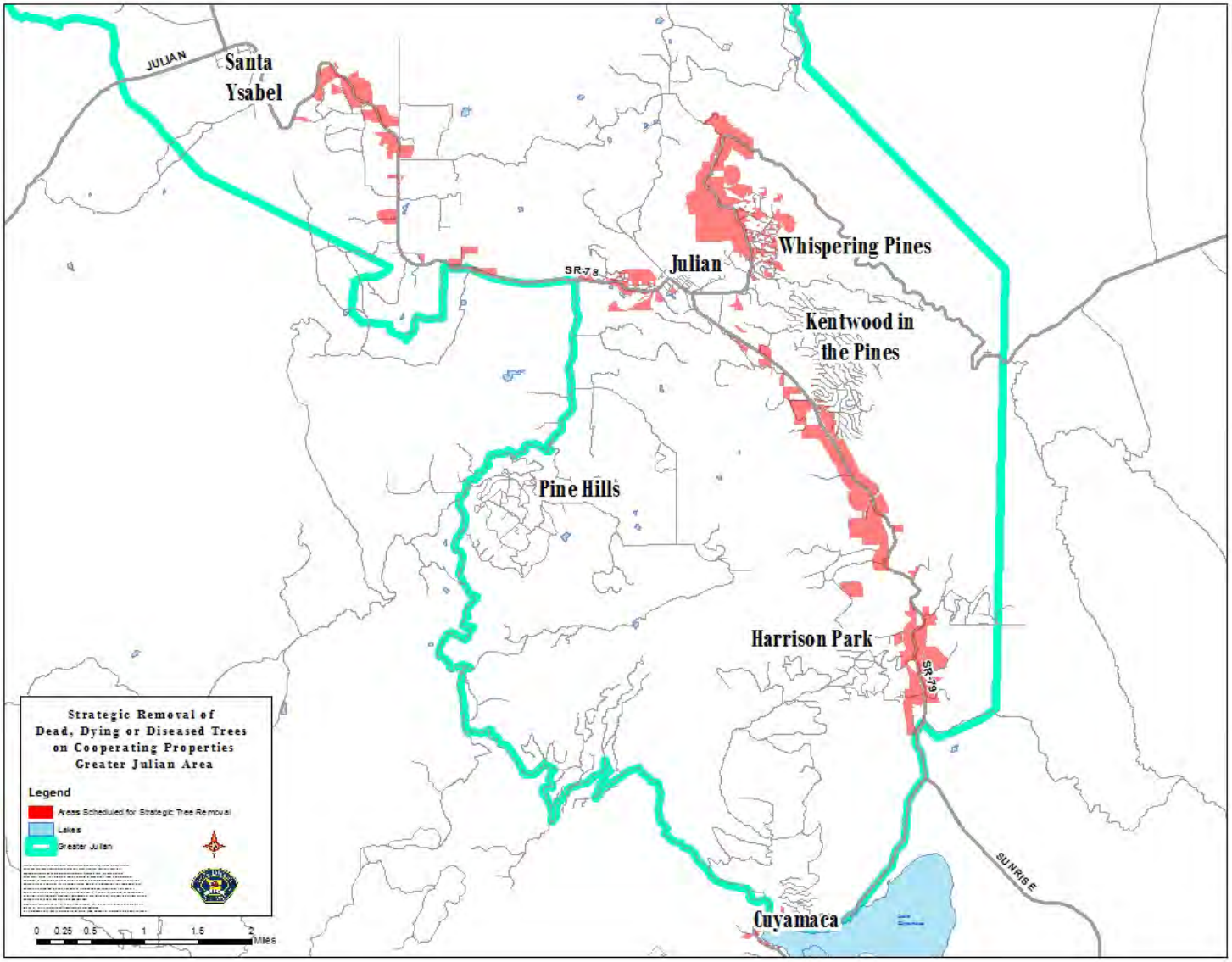

Figure 3. Potential Dead, Dying and Diseased Tree Removal Area if Funds Remain

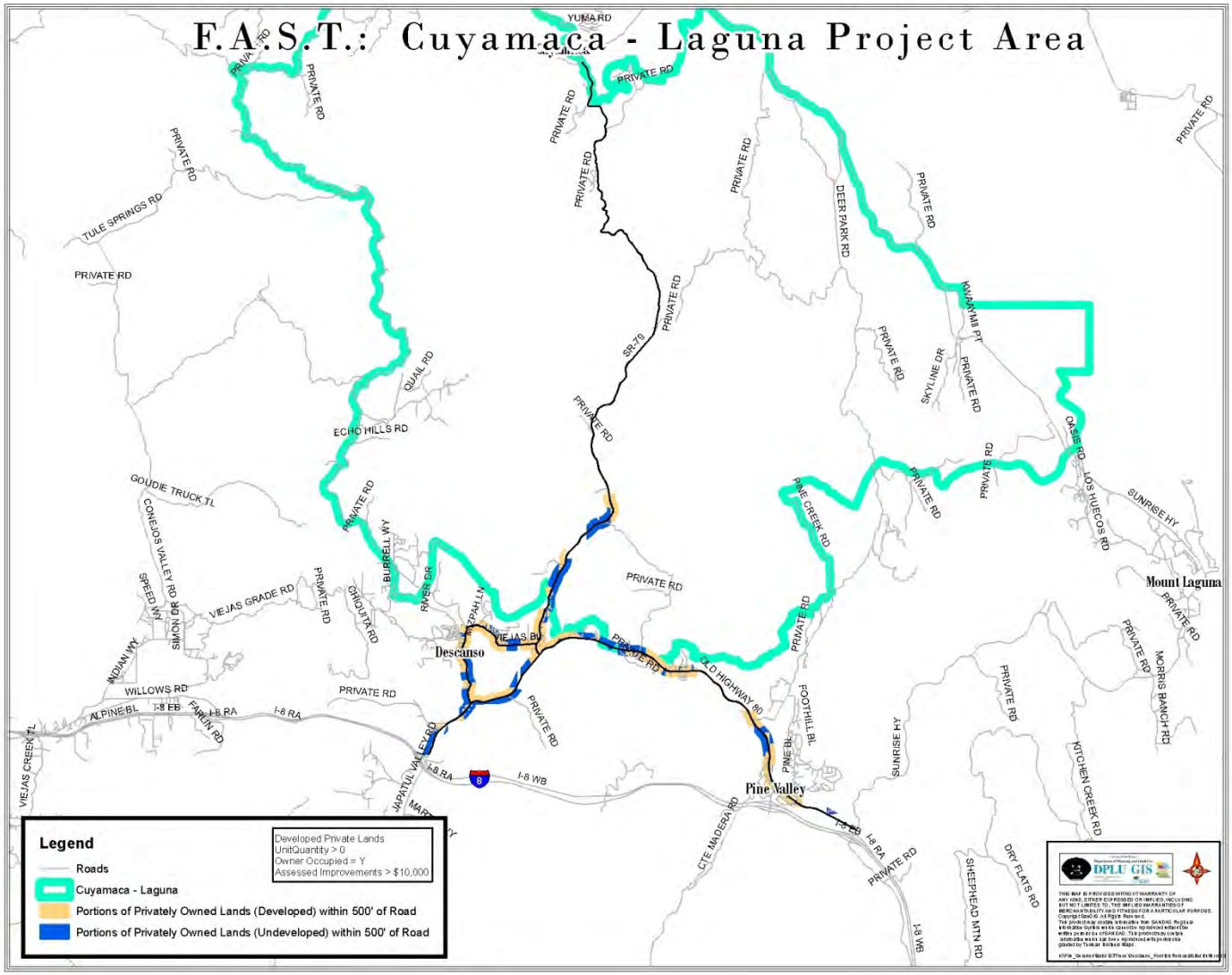

Figure 4. Example of a Wood Debris Staging Site